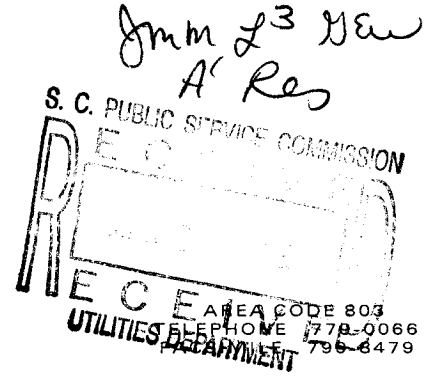


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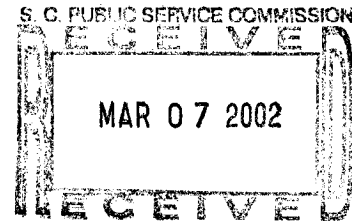
March 7, 2002

129672



VIA HAND DELIVERY

The Honorable Gary E. Walsh
Executive Director
South Carolina Public Service Commission
PO Drawer 11649
Columbia SC 29211



RE: Application of BellSouth Telecommunications Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the
Telecommunications Act of 1996
Docket No. 2001-209-C, Our File No. 01.75

Dear Mr. Walsh:

Enclosed is the original and ten (10) copies of the **Petition for Reconsideration and/or Clarification**, filed on behalf of Access Integrated Networks, Inc. ("AIN") and NuVox Communications, Inc. ("NuVox") in the above-referenced docket. By copy of this letter, I am serving all parties of record in this case and enclose my certificate of service to that effect.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it via the person delivering same. If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Yours truly,

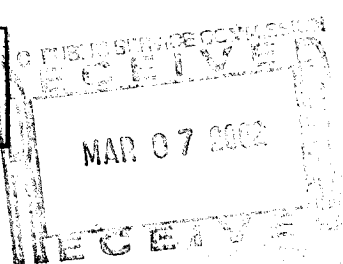
John J. Pringle, Jr.

JJP/cr

cc: Mr. Rodney Page
Hamilton E. Russell, Esq.
all parties of record

Enclosures

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BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION

DOCKET NO. 2001-209-C

Application of BellSouth Telecommunications)
Inc. To Provide In-Region InterLATA)
Services Pursuant to Section 271 of the)
Telecommunications Act of 1996)
_____)

**PETITION FOR
RECONSIDERATION AND/OR
CLARIFICATION**

Access Integrated Networks, Inc. ("AIN") and NuVox Communications, Inc. ("NuVox") (together "Petitioners"), pursuant to S.C. Code Ann., §§58-9-1200 and 1-23-10, et seq. (1976, as amended) and the applicable rules and regulations of the South Carolina Public Service Commission (the "Commission"), request that the Commission reconsider and/or clarify certain matters addressed in Order No. 2002-77 (the "Section 271 Order"), issued on February 14, 2002, in the above-referenced Docket. Petitioners received that order on February 25, 2002. In support of its petition, Petitioners state as follows:

LANGUAGE ON UNE COMBINATIONS

1. Section 2(d) of the Order, beginning on Page 75 thereof, contains a discussion and ruling on BellSouth's obligation to provide combinations of unbundled network elements ("UNEs").
2. In Docket No. 2001-65-C, the Commission issued Order No. 2001-1089 entitled "Order on UNE Rates", (the "UNE Order"). On Page 16 thereof, the Commission adopted the following definition of "currently combined"¹:

We recognize, however, that other States have ruled recently that policy considerations support a decision that BellSouth should be required to combine

¹ The term is set out in 47 C.F.R. § 51.315(b).

RETURN DATE: 01/11/02
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for CLECs UNEs that are ordinarily combined in BellSouth's network, even if the particular elements being proposed are not physically combined at the time the order is placed. We hereby join those other States and conclude that BellSouth shall provide for CLECs, at cost-based rates, combinations of UNEs that are ordinarily combined in BellSouth's network, regardless of whether the UNEs are in fact combined at the present time.

3. Petitioners are very appreciative of the Commission's ruling in the UNE Order.

However, Pages 76 and 77 of the Section 271 Order contain language that is inconsistent with the Commission's definition of "currently combined" adopted in the UNE Order.

4. For example, Page 76 of the Section 271 Order contains the following: "As this Commission has recognized, 'currently combines' means elements that are *actually* combined at the location where the CLEC seeks to provide service, not elements that may be combined elsewhere in the ILEC's network."

5. The above-quoted language clearly contradicts the definition of "currently combined" meaning "ordinarily combined in BellSouth's network" adopted in the UNE Order.

6. Therefore, Petitioners request that the Commission consider striking all the language contained on Page 76 of the Section 271 Order, as well as the first two full paragraphs on Page 77 thereof, because that language does not jibe with the Commission's ruling in the UNE Order.

7. The last paragraph on Page 77 of the Order references the UNE Order, that Order's ruling with respect to combinations, and attempts to ameliorate the concerns of CLECs:

Nevertheless, in Docket No. 2001-65-C, the Commission ordered BellSouth to provide both currently combined and new UNE combinations at cost-based rates. The Commission's decision from Docket No. 2001-65-C should address the concerns of CLECs voiced in this proceeding.

8. As set out in the UNE Order, however, the Commission adopted a more expansive definition of “currently combined”, rather than establishing a rule that BellSouth provide “new” UNE combinations at cost-based rates.

9. Therefore, Petitioners requests that the Commission clarify the language contained in the above-referenced paragraph.

FILING THE IPP

10. BellSouth proposed a Self-Effectuating Enforcement Mechanism (“SEEM”) as a penalty plan. BellSouth witness Al Varner, by means of brief testimony and a short time on the stand, modified the SEEM somewhat. Section 271 Order at Page 27.

11. The Commission ordered certain modifications to the SEEM, including a name change to the Incentive Payment Plan (“IPP”). The Section 271 Order further requires BellSouth to “include the IPP as Attachment J to the SGAT.” Section 271 Order at Page 28.

12. Because the IPP will affect CLECs operating in South Carolina, Petitioners asks that the Commission require the IPP, as amended by Mr. Varner and the Commission, to be filed with the Commission and served on all parties to this Docket by a date certain to be determined by the Commission.

13. Further, the parties in this Docket have no way of knowing when BellSouth’s SGAT, containing the final version of the IPP, will be filed with the Commission.

14. Therefore, Petitioners request that the final IPP be filed with the

Commission and served upon all parties to this Docket on or before a date certain set by this Commission.

MONTHLY PERFORMANCE DATA

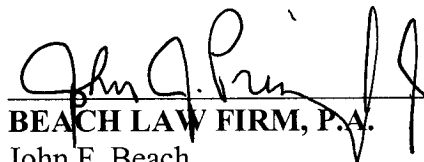
15. BellSouth has been providing the parties with monthly performance data in Adobe PDF. It appears that BellSouth scans its Microsoft Excel spreadsheets into PDF, essentially taking a picture of each page. The resulting documents have been quite large, taking considerable amounts of time for download.

16. Petitioners suggest that the Commission require or suggest to BellSouth that Excel documents can be converted directly into PDF by means of the Adobe Acrobat program, with the resulting documents occupying a great deal less disk space.

17. As an alternative, Petitioners suggest that BellSouth post the performance data at a website or other location, so that parties would have the option of obtaining the data.

WHEREFORE, having fully set forth their grounds for this petition, Petitioners respectfully request that the Commission reconsider Order No. 2002-77, clarify the matters set out herein, and grant such other relief as the Commission deems just and proper.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John J. Pringle, Jr.", is written over a horizontal line.

BEACH LAW FIRM, P.A.

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John J. Pringle, Jr.

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Post Office Box 11547

Columbia, SC 29211-1547

Telephone: 803/779-0066

Counsel for Petitioners

March 7, 2002

Columbia, South Carolina

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BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION

DOCKET NO. 2001-209-C

Application of BellSouth Telecommunications)	
Inc. To Provide In-Region InterLATA)	CERTIFICATE OF SERVICE
Services Pursuant to Section 271 of the)	
Telecommunications Act of 1996)	

This is to certify that I have caused to be served this day, one (1) copy of the **Petition for Reconsideration and/or Clarification** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

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Carol Roof

March 7, 2002

Columbia, South Carolina

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